

REMARKS

Reconsideration of all grounds of objection and rejection, and allowance of all the pending claims are respectfully requested in light of the above amendments and the following remarks. Claims 1-25, as amended, remain pending herein.

Applicant has provided a replacement sheet for FIG. 1 now having the legend of "Prior Art".

The Abstract has been edited to remove the narrative form and reduce the total length to less than 150 words. No new matter has been added.

Applicant has edited the specification to remove reference to specific claim numbers in the description.

Applicant appreciates the invitation in the Office Action to include section headings in the disclosure, but respectfully declines. Applicant respectfully submits that 37 CFR 1.77 uses the word "should", and is not a requirement. Reconsideration and withdrawal of this ground of objection are respectfully requested.

Claim 11 has been amended to overcome the objection on Page 4 of the Office Action. In addition, the dependencies of claim 19 have been changed to overcome the objection as to form.

Claim 1 stands rejected under 35 U.S.C. §112, first paragraph. Claims 1-25 stand rejected under 35 U.S.C. §112, second paragraph. Applicant respectfully overcomes these grounds of rejection for the reasons indicated herein below.

Applicant has addressed each and every ground of rejection in the Office Action from pages 5-9. Applicant respectfully affirms that no new matter has been added, and respectfully refers to page 13, lines 23-32, regarding support for claims 6 and 17.

Applicant notes that the claimed invention provides, *inter alia*, an apparatus and method for distinguishing between unwritten memory blocks and memory blocks that have been previously written to at least once before with redundant data encoding for detecting and/or labeling invalid states or states that are special (specification at page 3, lines 3-6).

For example, in addition to the mapping of physical states representing regular data, there is at least an addition physical state representing an exceptional or special state and which can be detected on the basis of a bit pattern by an error detection code, for example (specification at page 3, lines 6-15).

For all the foregoing reasons, Applicant respectfully submits that all grounds of objection and rejection in the Office Action have been overcome. A Notice of Allowance is respectfully requested.

Respectfully submitted,

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